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June 28, 2007

Mr. Sam Chummar
Remedial Project Manager
U.S. Environmental Protection Agency
Region 5
77 W. Jackson Blvd. SR-6J
Chicago, IL 60604

**Re: Emergency Response for Plainwell Mill Banks under United States-
Weyerhaeuser Company Consent Decree, No. 1:05CV003**

Dear Sam:

In accordance with Paragraph 67 of the Consent Decree for the Design and Implementation of Certain Response Actions at Operable Unit #4 and the Plainwell Inc. Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Docket No. 1:05CV003) (Consent Decree), Weyerhaeuser is hereby notifying EPA that certain work to be undertaken by Millennium Holdings, LLC and Georgia-Pacific, LLC under the Administrative Settlement Agreement and Order on Consent for Removal Action at the Plainwell Impoundment area of the Allied Paper/Portage Creek/Kalamazoo River Superfund site (Docket No. V-W-07-863) (Settlement Agreement) are actions or occurrences which threaten a release of Waste Material, as that term is defined in the Consent Decree, from the Plainwell Mill Property, and that such a release may present an immediate threat to public health or welfare or the environment.

More specifically, Weyerhaeuser understands that conditions along the Kalamazoo River at the former Plainwell impoundment have been determined, in EPA's February 14, 2007 Enforcement Action Memorandum, to represent an imminent threat to public health and the environment, and are thus being addressed as described in the Settlement Agreement. Upstream of Michigan State Highway 131, certain areas of river bank and floodplain soils have been targeted for removal. Downstream activities include dismantling a portion of the existing Plainwell Dam and relocating the flow of the Kalamazoo River to its original channel.

We understand that future response activities may include removal of additional downstream dams. A 2002 study by USGS suggests that removal of the three downstream dams will increase the slope of the river and river velocity. Two separate assessments of the impacts associated with dam removal (USGS 2004 and USDA 2004) concluded that erosion on the toe of the slope will widen the channel and erode the toe of the slope with resulting steeper bank angles. As the undercut expands, the bank sediments will be destabilized, resulting in bank

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failure. The presence of paper residuals in the floodplain soils along the Plainwell Mill, combined with the increased flow velocity associated with the dam removal that is part of the Plainwell Impoundment removal action, threatens the release of Waste Material.

In order to prevent, abate, or minimize such a release, Weyerhaeuser proposes to proceed under Paragraph 67 of the Consent Decree with the removal of residual materials present in the floodplain and bank areas near the river. The proposed work may represent a modification to the Statement of Work for the Mill Remedial Investigation and Feasibility Study (Mill RI/FS) and the Mill Remedial Action as described in the Consent Decree. Unless otherwise approved by EPA, specific emergency response work to be performed by Weyerhaeuser to address the threatened release will be designed and performed in a manner that is consistent with applicable provisions of the Settlement Agreement and the Former Plainwell Impoundment Time-Critical Removal Action Design Report (Appendix 4 to the Settlement Agreement) and that will address, to the extent feasible, any City of Plainwell land-use plans that are approved and available in a timely manner.

Weyerhaeuser intends to develop a design concept, identify data needs and then submit to EPA specific the data quality objectives and scope of work for remaining field activities. This work will provide EPA and Weyerhaeuser with significant additional information regarding the scope of the response action. Additional testing and field activities will be developed and submitted as an amendment to the Multi-area Quality Assurance Project Plan (QAPP) being prepared for the OU-4 Emergency Actions. As soon as possible after completion of the initial field work, data evaluation and design activities, Weyerhaeuser will submit a Plainwell Mill Bank Emergency Action Design Report and proposed implementation schedule for approval by EPA.

We would appreciate it if you would send a letter at your earliest convenience that contains EPA's authorization for Weyerhaeuser to proceed with this work under Paragraph 67 of the Consent Decree. We understand that the time-critical removal work in the upstream reaches of the Kalamazoo River and downstream in preparation for dam removal is underway and is expected to be completed this construction season, so time is of the essence. As such, Weyerhaeuser is prepared to proceed promptly.

Weyerhaeuser looks forward to working with EPA on this important project.

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Hale", with a stylized, flowing script.

Jennifer Hale
Environmental Manager
Weyerhaeuser Company

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cc: John P. Gross
Joseph P. Jackowski
Mark W. Schneider
Eileen L. Furey

References

USGS 2002: Rheaume, S. J., C. M. Rachol, D. L. Hubbell and Andreanne Simard, 2002, Sediment Characteristics and Configuration within Three Dam Impoundments on the Kalamazoo River, Michigan, 2000, U.S. Geological Survey Water-Resources Investigations Report 02-4098.

USGS 2004 Syed, A.U., Bennett, J.P., and Rachol, C.M., 2005, A pre-dam-removal assessment of sediment transport for four dams on the Kalamazoo River between Plainwell and Allegan, Michigan: U.S. Geological Survey Scientific Investigations Report 2004-5178, 41 p

USDA 2004: Wells, R., Langendoen, E.J., Simon, A. 2004. Numerical simulation of sediment loads and channel changes along the kalamazoo river between plainwell and otsego city, michigan. USDA-ARS National Sedimentation Laboratory Research Report. No. 44, 46 pp.